



First Focus on Children, a national children's advocacy group dedicated to making children and families a priority in federal budget and policy decisions, thanks you for the opportunity to submit the following comment for the 2022 spring National Advisory Committee meeting. As an organization committed to ensuring that all kids in the United States have the equal opportunity to thrive and a co-lead of the [Count All Kids Committee](#), we remain very concerned about the potential detrimental implications of the undercount of children in the 2020 Census on federal spending on children over the next decade.

The recent release of Demographic Analysis data shows that the net undercount of young children in 2020 was even larger than in 2010, and some initial analysis from Dr. Bill O'Hare finds that the proportion of Black and Hispanic children missed in 2020 will be worse than 2010.

First Focus on Children convenes [the Children's Budget Coalition](#), which is made up of over 80 national children's advocacy organizations with priorities across a diverse range of issues, such as health, education, nutrition, the child welfare system, early childhood learning, safe housing, and more. The coalition's work capitalizes on members' broad policy expertise to collectively advocate for children to receive their fair share of federal investments, as well as serve as a resource for policymakers, stakeholders, and other advocates. First Focus on Children also issues an [annual Children's Budget Book](#), which tracks and analyzes domestic and international spending on children in the federal budget.

Through this work, we know that the federal government continues to underinvest in our nation's children and families, which has resulted in the United States [ranking near the bottom of dozens of advanced nations in terms of the well-being of its children](#), with [higher rates of child poverty](#), [higher infant mortality rates](#), and children [suffering greater inequality in access to educational resources](#) than our wealthy peer nations. The undercount of young children in the 2020 decennial census threatens to only exacerbate this underinvestment and inequality, drive resources away from those most in need, and deprive children of millions of dollars in funding that supports their health, education, and more.

We greatly appreciate the Census Bureau's efforts to prioritize children and fix the undercount of young children in 2020, and ask that you take the following steps to ensure an accurate accounting of all children in the United States.

1. We applaud the formation of a Cross-Directorate team on the undercount of young children and suggest the team should include in its work the following activities below, as well as include a focus on the undercount of young Hispanic and Black children, who are missed at more than double the rate of White children. For that purpose, we also suggest that they include stakeholders from these communities.
 - a. *reviewing ideas and recommendations from the 2020 Census taskforce on the young child undercount to see which ideas could not be implemented in 2020 for lack of time but might be included in 2030 planning,*
 - b. *assessing the effectiveness of the mailing to communities at high risk of missing young children in 2020,*
 - c. *assessing other efforts to count young children,*
 - d. *assessing the impact of operational decisions on the count of young children,*
 - e. *building a research plan to assess at the substate level where young children were missed most often, and what factors correlate with high levels of missing young children,*

- f. *assessing whether the rate at which young children of color were left off even when families respond changed in 2020 compared to 2010, or whether the change in the count of young children was primarily due to lessened response rates in those communities,*
- g. *updating the studies done by the undercount of young children research team between 2015 and 2019*
- h. *Evaluating the use of administrative records in 2020 and the potential use of administrative records for evaluating 2020 related to young children*

2. Given that the blended base for population estimates has important implications for the equitable allocation of federal funding for children and families, we urge the Bureau to undertake an assessment of whether the use of the blended base will change the count of Black populations and Hispanic populations, and of other racial and ethnic groups compared to use of Decennial Census data. We commend the Bureau for focusing on the improvement in the data for young children in the blended base method in their recent publication on this topic.

3. We urge the Bureau to research the accuracy of rosters using administrative data with respect to young children and to share with stakeholders its methods for determining household rosters when different sets of administrative data produce different household members. We also encourage the Bureau to research the accuracy of the household rosters in households counted using administrative data compared to households that responded on their own and households counted during NRFU by enumerators, particularly with respect to young children. The quality of these data is important because over 5% of all households in the 2020 Census were counted using administrative data, and because the Bureau is exploring ways to expand its use of administrative data. We note that the definition of household varies for income tax purposes, SNAP households, and others. Because so many households have extended families, complex households, or multiple households sharing one residence, it is essential to make sure that everyone in a residence is counted and that people who show up in only some records are still included. We are particularly concerned that tax records would not include any children born in the first three months of the census year.

Thanks again for the opportunity to submit these comments and please don't hesitate to reach out with any questions.

Sincerely,

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